

Of Counsel:
MILLER SHEA
A Limited Liability Law Company

JEFFREY P. MILLER 7559-0
American Savings Bank Tower
1001 Bishop Street, Suite 2925
Honolulu, Hawaii 96813
Telephone: (808) 536-2442
Facsimile: (808) 369-8281
Email: jeff@millershealaw.com

Attorney for Plaintiffs
TRUSTEES OF THE HAWAII
CARPENTER TRUST FUNDS

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

HAWAII CARPENTERS TRUST)	CIVIL NO. CV 16-00670-DKW-KSC
FUNDS, <i>Health & Welfare Fund by</i>)	
<i>its trustees</i> Henry Iida, Russell)	PLAINTIFFS' MOTION FOR ENTRY
Young, Audrey Hidano, Glen)	OF DEFAULT JUDGMENT
Kaneshige, Eric Hashizume, George)	AGAINST DEFENDANT
Ehara, Ronald Taketa, Kyle Chock,)	VISIONARY GENERAL
Shayne Chung, Conrad C. Verdugo,)	CONTRACTING, LLC;
Jr., Ralph Hoohuli, and Travis)	MEMORANDUM IN SUPPORT OF
Murakami; <i>Apprenticeship &</i>)	MOTION; DECLARATION OF
<i>Training Fund by its trustees</i> Claude)	JEFFREY P. MILLER; EXHIBITS "1"
Matsumoto, Thomas Toma, Conrad)	– "3"; DECLARATION OF PAUL
Murashige, Dale Sakamoto-Yoneda,)	MARX; CERTIFICATE OF SERVICE
Roy Morioka, Vince Nihipali, Sheri)	
Mau, Mike Goodnight, Kyle Chock,)	
Ronald Taketa, Mitchell Tynanes,)	
Sean Newcamp, Ralph Hoohuli and)	
Travis Murakami; <i>Vacation &</i>)	
<i>Holiday Fund by its trustees</i> Gerard)	
Sakamoto, James Watanabe, Paul)	
Silen, Paul Sasaki, Jay Kadowaki,)	

Sharon Thom, Roy Morioka, Kyle)
 Chock, Sean Newcamp, Mitchell)
 Tynanes, Ralph Hoohuli, and Travis)
 Murakami; *Market Recovery Program*)
by its trustees Thalia Choy, Alan)
 Shintani, Justin Izumi, Ken)
 Kawamoto, Gerard Sakamoto, Bill)
 Wilson, Lance Wilhelm, Leonard)
 Hoshijo, Justin Kochi, Garrett Takara,)
 Sean Newcamp, Kyle Chock, David)
 Samson and Mitchell Tynanes;)
Financial Security Fund by its)
trustees Kenneth Spence, Conrad)
 Murashige, Kenneth Sakurai, Wesley)
 Mikuni, Alan Shintani, Kyle Chock,)
 Ronald Taketa, Shayne Chung, Sean)
 Newcamp, Garrett Takara, Ralph)
 Hoohuli, Clyde Sugawa, Joyce)
 Furukawa, and Travis Murakami;)
Drywall Training Fund by its trustees)
 Vince Nihipali, Sr., Lito Alcantra,)
 Bert Beaman, Mike Goodnight, Kevin)
 Respecki, Sean Newcamp, Garrett)
 Takara, Edmund Aczon, David)
 Samson and Ivan Lay; *401-K Fund by*)
its trustees Kenneth Spence, Conrad)
 Murashige, Kenneth Sakurai, Wesley)
 Mikuni, Alan Shintani, Kyle Chock,)
 Ronald Taketa, Shayne Chung, Sean)
 Newcamp, Ralph Hoohuli, Clyde)
 Sugawa, Joyce Furukawa, and Travis)
 Murakami,)
)
 Plaintiffs,)
)
 vs.)
)
 VISIONARY GENERAL)
 CONTRACTING, LLC, JOHN)

DOES 1-100; JANE DOES 1-100;)
DOE CORPORATIONS 1-100; DOE)
PARTNERSHIPS 1-100; DOE)
ENTITIES 1-100; DOE)
GOVERNMENTAL UNITS 1-100,)
)
Defendants.)
)
)

**PLAINTIFFS' MOTION FOR ENTRY OF DEFAULT JUDGMENT
AGAINST DEFENDANT VISIONARY GENERAL CONTRACTING, LLC**

Plaintiffs HAWAII CARPENTERS TRUST FUNDS, by its trustees,
et al. (hereinafter "HCTF"), by and through their attorneys, Miller Shea, LLC,
hereby respectfully move this Court for an order granting a default judgment
against Defendant VISIONARY GENERAL CONTRACTING, LLC. Default
against Defendant VISIONARY GENERAL CONTRACTING, LLC was entered
by the Clerk of the Court on February 7, 2017.

This Motion is made pursuant to Rules 7 and 55(b) of the Federal
Rules of Civil Procedure and is supported by the attached Memorandum in Support
of Motion, Declaration of Jeffrey P. Miller, exhibits, and the records and files
herein.

DATED: Honolulu, Hawaii, March 7, 2017.

/s/ Jeffrey P. Miller
JEFFREY P. MILLER
Attorney for Plaintiffs
TRUSTEES OF THE HAWAII
CARPENTERS TRUST FUNDS